

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Experimental Presorted )  
Priority Mail Rate Categories, 2001 )

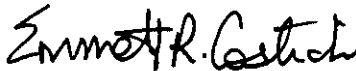
Docket No. MC2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: THOMAS M. SCHERER (OCA/USPS-T1-24-25)  
(April 27, 2001)

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Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate ("OCA") hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-6 to witness Thomas M. Scherer dated March 23, 2001, are hereby incorporated by reference.

Respectfully submitted,



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Director  
Office of the Consumer Advocate

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OCA/USPS-T1-24. Please refer to your testimony beginning on page 4 where it discusses the rationale for presort discounts for Priority Mail. Also, please review the testimony of witness Kalenka, USPS-T-3, at page 3, lines 4-6, page 6, lines 16-21, and page 7, lines 1-4. Is the Postal Service proposing presort discounts for Priority Mail as a means to retain Priority Mail volumes in the face of increasing competition? Please explain and provide any documents related to competition as a factor in proposing presort discounts for Priority Mail.

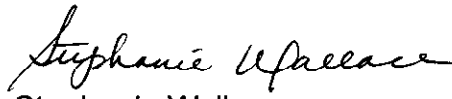
OCA/USPS-T1-25. Please refer to your testimony at page 2, lines 18-20, and page 3, line 1.

- a. Please confirm that some Priority Mail pieces are “letters” as that term is defined at 39 C.F.R. §310.1(a). If you do not confirm, please explain.
- b. Please confirm that the discounts proposed in this docket will be available for “letters” and non-“letters.” If you do not confirm, please explain.
- c. Please confirm that an “extremely urgent letter” may be carried outside the mail without paying postage under certain circumstances described at 39 C.F.R. §320.6(a)-(c). If you do not confirm, please explain.
- d. Please confirm that according to 39 C.F.R. §320.6(a)-(c), a one-pound “letter” delivered outside the mail in more than 24 hours would not be considered extremely urgent unless the carrier charged at least \$7.00. If you do not confirm, please explain.
- e. Please explain how a discount from a \$3.50 rate would discourage mailers of one-pound pieces from using a different carrier and paying \$7.00 per piece.

- f. Please confirm that the Postal Service could eliminate competition for Priority Mail "letters" by amending 39 C.F.R. §320.6(a)-(c). If you do not confirm, please explain.
- g. What proportion of ADP's Priority Mail volume consists of "letters"?
- h. Please confirm that ADP would have to pay at least \$7.00 per piece to send its Priority Mail "letters" outside the mail. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
Stephanie Wallace

Washington, D.C. 20268-0001  
April 27, 2001